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January 4, 2022

**VIA ECF**

Hon. Katherine Polk Failla, U.S.D.J.  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: Southwest Marine and General Insurance Company v. State Farm et al...  
U.S.D.C., Southern District of New York,  
Civil Action No. 1:21-cv-01551-KPF  
Our File No. 89-19584

Dear Judge Failla:

Our firm represents plaintiff in the above-captioned action. We submit this letter jointly with counsel for Defendants State Farm and Travelers to request a 60- day extension of all deadlines in the current scheduling order and to request adjournment of the January 12, 2022 pretrial conference. This is the parties' second request for an extension of time of the scheduling order deadlines and all parties consent.

All written discovery was completed. On or about November 4, 2021, State Farm issued settlement offers to Plaintiff Southwest Marine and General Insurance Company and Defendant Travelers. In recent weeks, all parties have engaged in further settlement discussions to resolve issues pertaining to the terms of any settlement and to negotiate the language of a settlement agreement. Drafts of a proposed settlement agreement are currently being circulated

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for review and revision among the parties. All parties anticipate that we will be able to reach a settlement of this action which will result in discontinuance of this action without prejudice.

The parties would like an opportunity to continue negotiations to resolve those differences before proceeding with additional fact discovery, which was otherwise scheduled to be completed by January 7, 2022. Although the parties have produced documents and responded to interrogatories, in the unlikely event that a settlement cannot be reached, additional time is necessary to complete party and non-party depositions to the extent that the case cannot be resolved.

Pursuant to Your Honor's Individual Rules, a proposed Revised Scheduling Order is enclosed, which includes a 60-day extension of all discovery deadlines (except those that have already been completed by the parties).

Thank you in advance for your consideration of this matter.

Respectfully submitted,

*Stacey H. Snyder*

STACEY H. SNYDER

Enclosure (Revised Scheduling Order)

cc: Mark T. Whitford, Jr., Esq. (via ECF)  
Andrew M. Premisler, Esq. (via ECF)

Application GRANTED. The pretrial conference in this matter is hereby ADJOURNED to **March 16, 2022, at 10:00 a.m.**

The Court will issue the parties proposed amended Case Management Plan under separate cover.

The Clerk of Court is directed to terminate the motion at docket entry 29.

SO ORDERED.

Dated: January 5, 2022  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE